

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

AMERICAN TRANSIT INSURANCE COMPANY,

Plaintiff,

- against -

BRADLEY PIERRE, MARVIN MOY, M.D.,
RUTLAND MEDICAL P.C., WILLIAM A. WEINER,
D.O., NEXRAY MEDICAL IMAGING, P.C. d/b/a
SOUL RADIOLOGY MEDICAL IMAGING and
JOHN DOES 1-15,

Defendants.

1:24-cv-00360-RPK-CLP

**NOTICE OF MOTION FOR AN ORDER GRANTING A WRIT OF
PREJUDGMENT ATTACHMENT AGAINST ALL DEFENDANTS**

PLEASE TAKE NOTICE that Plaintiff American Transit Insurance Company, by and through its undersigned counsel, will move this Court, before the Honorable Rachel P. Kovner, at the United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, NY 11201, at a time and date to be determined by the Court for an order granting a writ of prejudgment attachment pursuant to Fed. R. Civ. P. 64, through which New York C.P.L.R. §§ 6201 and 6212 applies against all Defendants.

PLEASE TAKE FURTHER NOTICE that Plaintiff American Transit Insurance Company will rely on this Notice of Motion, the accompanying Memorandum of Law, the Declaration of Cheryl Glaze dated November 13, 2024, and the exhibits attached thereto, the Declaration of James W. Perkins dated November 13, 2024, and the exhibits attached thereto, and all prior pleadings, papers, and proceedings in support of this Motion.

Dated: New York, New York
November 13, 2024

GREENBERG TRAURIG, LLP

By: /s/ James W. Perkins

James W. Perkins
Francis J. Serbaroli
John C. Molluzzo, Jr.
Elizabeth J. Sullivan
One Vanderbilt Avenue
New York, New York 10017
(212) 801-9200
perkinsj@gtlaw.com
serbarolif@gtlaw.com
molluzzoj@gtlaw.com
sullivanel@gtlaw.com

SHORT & BILLY, P.C.

Skip Short
Ioanna Zevgaras
217 Broadway Suite 300
New York, New York 10007
(212) 732-3320
sshort@shortandbilly.com
ioanna@shortandbilly.com

*Attorneys for American Transit
Insurance Company*